

Supreme Court of the United States United States Courts of Appeals

CERTIFICATE OF COMPLIANCE

No. 22-212

JONATHAN SAVAS, ET AL.,

Petitioners,

v.

CALIFORNIA STATE LAW ENFORCEMENT AGENCY, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Protect the First Foundation Supporting Petitioners contains 3,391 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2022.

MADE

Donna J. Moore Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: Beenhu 2, 2022 John Dally Notary Public

[seal]



JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires Esbruary 14, 2023